#### Remarks

# **I.** Administrative Overview

Claims 1-30 were presented for examination. Applicants hereby amend Claims 1, 9, 13, and 16, and cancel Claims 24-28. Upon entry of the present amendments, Claims 1-23 and 29-30 are presented for examination. No new matter has been introduced.

Applicants respectfully request reconsideration and withdrawal of the objections and rejections to the claims as amended.

## II. Rejections under 35 U.S.C. § 112

Claims 1-30 are rejected under 35 U.S.C. § 112, second paragraph as being indefinite and for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention. Applicants respectfully submit that the amendments made to Claims 1 and 16 overcome this rejection. Accordingly, Applicants respectfully request that the Examiner withdraw this rejection.

## III. Rejections under 35 U.S.C. § 103

#### Claims 1-6 and 16-21

Claims 1-6 and 16-21 are rejected under 35 U.S.C. § 103(a) as unpatentable over Microsoft Windows 2000/2003 Server as evidenced by "Remote Access VPN Connections" ("Microsoft01") in view of ISA Server 2000/2004 as evidenced by "Common DNS Issues in VPN Networking" ("ISA01") and "Multiple Simultaneous VPN Connections" ("LinuxQuestions"). Applicants respectfully submit that Claims 1-6 and 16-21 as previously presented are patentable over any combination of Microsoft01, ISA01 and LinuxQuestions. Nevertheless, Claims 1 and 16 have been amended to more clearly recite the claimed invention. Applicants therefore submit that amended Claims 1-6 and 16-21 are patentable over any combination of Microsoft01, ISA01 and LinuxQuestions.

A claimed invention is obvious when a cited reference either alone or in combination with another reference, teaches or suggests each and every element of the claimed invention.

Applicants respectfully submit that any combination of Microsoft01, ISA01 and LinuxQuestions

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fails to teach or suggest each and every element of the claimed invention because none of these references teach or suggest assigning a first virtual host name to a third user session.

At best, Microsoft01 describes assigning an IP address to a VPN client where the IP address can include any of the following elements: a destination IP address; a VPN server address; a source IP address; an ISP allocated IP address; and a VPN server allocated IP address. Microsoft01 does not describe allocating the same virtual host name used to identify a first user session of a first user accessing the network using a first computer, to a third user session of a first user accessing the network using a second computer. Thus, Microsoft01 does not teach or suggest each and every element of the claimed invention.

ISA01 describes assigning a DNS server address to a VPN client so that the VPN client can translate network host names into IP addresses using the DNS server resident at the DNS server address. At no point does ISA01 describe assigning the same virtual host name used to identify a first user session of a first user accessing the network using a first computer, to a third user session of a first user accessing the network using a second computer. Thus, ISA01 does not teach or suggest each and every element of the claimed invention.

Like Microsoft01 and ISA01, LinuxQuestions also does not teach or suggest assigning the same virtual host name to a user in two different user sessions. LinuxQuestions does not teach or even suggest that a virtual host name can or should be assigned to a user. Thus, LinuxQuestions does not teach or suggest each and every element of the claimed invention.

In light of the above mentioned remarks, Microsoft01, ISA01 and LinuxQuestions fail to teach or suggest each and every element of independent Claims 1 and 16. For this reason, Claims 1 and 16 are patentable over any combination of Microsoft01, ISA01 and LinuxQuestions. Claims 2-6 and 17-21 are also patentable over any combination of Microsoft01, ISA01 and LinuxQuestions, because Claims 2-6 and 17-21 are dependent on Claims 1 and 16. Accordingly, Applicants respectfully request that the Examiner withdraw this rejection.

# Claims 7-9, 14-15, 22-24 and 29-30

Claims 7-9, 14-15, 22-24 and 29-30 are rejected under 35 U.S.C. § 103(a) as unpatentable over Microsoft01 in view of ISA01 in view of LinuxQuestions and in further view of Examiner's official notice that registering with DNS servers, as is described in the above-

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mentioned claims, is well known in the art ("OfficialNotice"). Claim 24 has been cancelled thereby mooting the rejection with respect to that claim. Applicants respectfully submit that Claims 7-9, 14-15, 22-23 and 29-30 are patentable over any combination of Microsoft01, ISA01, LinuxQuestions and Official Notice.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1 and 16 are patentable and in a condition for allowance Because Claims 7-9, 14-15, 22-23 and 29-30 depend from and incorporate all the patentable subject matter of Claims 1 and 16, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites OfficialNotice merely for the purpose of addressing registering with a DNS server. OfficialNotice fails to cure the deficiencies of Microsoft01, ISA01 and LinuxQuestions, and so fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 7-9, 14-15, 22-23 and 29-30 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 7-9, 14-15, 22-23 and 29-30 under 35 U.S.C. §103.

### Claims 10-11 and 25-26

Claims 10-11 and 25-26 are rejected under 35 U.S.C. § 103(a) as unpatentable over Microsoft01 in view of ISA01 in view of LinuxQuestions and in further view of "Assign Static IP to a VPN user" ("VelocityReviews"). Claims 25-26 have been cancelled thereby mooting the rejection with respect to those claims. Applicants respectfully submit that Claims 10-11 are patentable over any combination of Microsoft01, ISA01, LinuxQuestions and Velocity Reviews.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1 and 16 are patentable and in a condition for allowance Because Claims 10-11 depend from and incorporate all the patentable subject matter of Claims 1 and 16, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites VelocityReviews merely to address an IP address comprising the virtual host name following the first user from the first computer to a second computer and being associated with the second computer. VelocityReviews fails to cure the deficiencies of Microsoft01, ISA01 and LinuxQuestions, and so fails to detract from the patentability of the claimed invention. As

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such, Applicants submit that Claims 10-11 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 10-11 under 35 U.S.C. §103.

#### Claims 12-13 and 27-28

Claims 12-13 and 27-28 are rejected under 35 U.S.C. § 103(a) as unpatentable over Microsoft01 in view of ISA01 in view of LinuxQuestions in view of VelocityReviews and in further view of U.S. Patent No. 6,856,676 to Pirot et al. ("Pirot"). Claims 27-28 have been cancelled thereby mooting the rejection with respect to those claims. Applicants respectfully submit that Claims 12-13 are patentable over any combination of Microsoft01, ISA01, LinuxQuestions, Velocity Reviews and Pirot.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1 and 16 are patentable and in a condition for allowance Because Claims 12-13 depend from and incorporate all the patentable subject matter of Claims 1 and 16, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites Pirot merely to address assigning, while the first user accesses the first computer, a third virtual hostname to the first user accessing a second computer. Pirot fails to cure the deficiencies of Microsoft01, ISA01 and LinuxQuestions, and so fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 12-13 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 12-13 under 35 U.S.C. §103.

# **IV. Conclusion**

Applicants contend that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application, the Examiner is urged to contact Applicants' agent at the telephone number identified below.

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# Respectfully submitted, CHOATE, HALL & STEWART LLP

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